

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA )  
                                )  
                                )  
v.                            ) Docket No. 2:25-mj-00024  
                                )  
                                )  
JAMAL CURTIS, aka "Robbie", )  
Defendant.                   )

**MOTION FOR DETENTION**

NOW COMES the United States of America, by and through its attorney, Michael P. Drescher, Acting United States Attorney for the District of Vermont, and moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substances Act for which a maximum term of imprisonment of ten years or more is prescribed. *See* 18 U.S.C. § 3142(f)(1)(C).
2. Reason For Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of any other person and the community or the defendant's future appearance for court proceedings.
3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against the defendant under § 3142(e).
4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing upon completion of the pretrial services report.
5. Other Matters. The defendant is charged with four counts of distribution of cocaine base and fentanyl based on four controlled purchases. The weight of the evidence is strong and includes covertly recorded audio and video during the transactions. Additionally, at the time of

the defendant's arrest on February 24, 2025, Curtis had approximately 16.6 grams of cocaine base in his possession. The cocaine base was packaged in eleven individual baggies, consistent with preparation for distribution.

The defendant has a lengthy criminal history, with convictions related to controlled substances and firearms dating back to 2002. His criminal history also includes a conviction for assault with injury. An initial review of his criminal history suggests that a number of his criminal involvements occurred when he was on some form of community supervision; either probation or parole. It is the Government's understanding that the defendant is currently subject to supervision related to convictions in New York State and was subject to that supervision at the time of the charged conduct.

The defendant's January 22, 2025, interaction with law enforcement wherein he provided multiple fictitious names and birth dates is indicative of an intent and attempts to avoid identification and capture. The Government is also aware that the defendant failed to appear for Vermont state court proceedings on February 20 and February 24, 2025, and is subject to a warrant from New York State. These incidents suggest a further risk that the defendant will fail to appear for future court proceedings and seek to evade capture.

Within the last month, Burlington Police Department has initiated multiple investigations wherein individuals have alleged that the defendant assaulted them or threatened them with a firearm. These individuals have identified the assailant as "Robbie," the defendant's known alias, and provided physical descriptions matching the defendant. The reporting individuals indicated that these incidents had occurred after they accumulated debts to the defendant related to the distribution of controlled substances. The defendant's use of violence, threats of violence, and the involvement of firearms in connection with his drug trafficking activities, indicates a

significant risk to the safety of the community that cannot be addressed by any condition or combination of conditions.

Dated at Burlington, in the District of Vermont, February 25, 2025.

Respectfully submitted,

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